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Hearing Date: October 22, 2014
Hearing Time: 10:00 a.m. EST
Objection Deadline: October 10, 2014

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the estate
of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

DEFENDANTS IN ADVERSARY
PROCEEDINGS LISTED ON EXHIBIT 1
ATTACHED HERETO,

Defendants.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. Nos. listed on Exhibit 1
Attached Hereto

**NOTICE OF MOTION FOR LEAVE TO REPLEAD PURSUANT TO
FED. R. CIV. P. 15(a) AND COURT ORDER AUTHORIZING LIMITED
DISCOVERY PURSUANT TO FED. R. CIV. P. 26(d)(1)**

Irving H. Picard, as trustee (the “Trustee”) for the liquidation of the business of Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff, by the Trustee’s undersigned counsel, will move before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004, on October 22, 2014, or as soon thereafter as counsel may be heard, seeking entry of an order (i) granting the Trustee leave to replead the operative complaints in certain adversary proceedings identified on Exhibit 2, attached hereto, pursuant to Fed. R. Civ. P. 15(a), made applicable to this proceeding pursuant to Fed. R. Bankr. P. 7015; and (ii) directing the defendants in adversary proceedings identified on Exhibit 3, attached hereto, to comply with the Proposed Limited Document Discovery Demand attached as Exhibit D to the declaration of Regina Griffin dated August 28, 2014 pursuant to Fed. R. Civ. P. 26(d), made applicable to this proceeding by Fed. R. Bankr. P. 7026.

PLEASE TAKE FURTHER NOTICE that written objections to the Motion must be filed with the Clerk of the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004 by no later than October 10, 2014 (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan and Regina Griffin.

Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the Motion.

Dated: August 28, 2014
New York, New York

Respectfully submitted,

/s/ Regina Griffin

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